



December 19, 2001

Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67, DA
01-1555**

Dear Ms Salas:

On December 18, 2001, Larry Fenster, Kim Wobschall, and Hadi Alsegaf from WorldCom, met with Sam Feder, Senior Legal Advisor to Commissioner Martin to discuss WorldCom's Petition for Clarification to receive interstate funding for its internet-based relay service "IP-Relay."

At the meeting, we discussed the service and competitive benefits persons with hearing disabilities would receive if the Commission were to permit carriers providing such internet-based relay services to be reimbursed solely from the Interstate TRS Fund. We explained that due to the lack of originating ANI, it was not technically feasible to reliably allocate reimbursement claims among the state and interstate jurisdictions for IP Relay calls. We explained that Section 225(d)(3) authorized the Commission to reimburse calls solely on an interstate basis where it was not feasible for states to reimburse for certain types of relay calls. We also explained that the absence of existing mechanisms to receive reimbursement from States where the carrier was not the certified relay provider, made a proxy-based allocation of reimbursement to the States infeasible. We also discussed the need to either modify or waive certain of the Commission's minimum mandatory requirements. Finally, we urged quick consideration of WorldCom's petition. We explained that WorldCom had been offering the service without reimbursement for one year since seeking reimbursement approval from the Commission, and that further delays would represent a significant financial hardship on WorldCom's Global Relay business.

If you have any questions please don't hesitate to contact me.

Sincerely,

Larry Fenster

Larry Fenster
202-736-6513

cc: Sam Feder

Janet Sievert